

REMARKS

Claims 1-16 are pending in the present application.

Claims 1-16 have been rejected.

Claims 17-20 have been added.

Claims 1-20 remain in the case.

Please reconsider the rejection of Claims 1-16 and new Claims 17-20.

35 U.S.C. § 112, Second Paragraph – Indefiniteness

On Page 2 of the September 7, 2004 Office Action, the Examiner rejected Claims 1-16 under 35 U.S.C. § 112 (Second paragraph) as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Applicants respectfully traverse these rejections for the reasons set forth below.

The Examiner stated that “In claim 1, the recitation ‘a second interface with an insulating material laterally sounding [surrounding] the first track,..., the first rack [track] further comprising at least one additional interface with an insulating material, placed at a distance from the first connection which is substantially less than a width of the first track at the first interface.’ Is not understood and is confusing. Is a second interface similar to the first interface of the first track? If so, how could the second interface be with an insulating material? Should not it be with a second conducting connection? Similar to the second interface, one additional interface (with an insulating

material). Where is the exact location of the width of the first track at the first interface? Do the Applicants mean to say “the width of the first track” which is, for example L1 shown in Fig. 2.” (September 7, 2004 Office Action, Page 2, Lines 6-15).

The legal requirement for the definiteness of patent claims requires that the patent claims, when read in the light of the specification of the patent application, reasonably apprise those skilled in the art of the scope of the invention. See, e.g., *Hybritech, Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 1385, 231 USPQ 81, 94, 95 (Fed. Cir. 1986), *cert. denied* 480 U.S. 947 (1987) (claims need only “reasonably apprise those skilled in the art” as to their scope). The Applicants respectfully submit that the specification of the patent application provides sufficient clarity as to the meaning of the words of the patent claims to make the meaning of the claims definite.

For example, consider Claim 1:

1. (Original) An electrical connection device between a first conducting track and a second conducting track of an integrated circuit comprising
a first conducting connection between the first track and the second track, the first track having a first interface with the first connection and a second interface with an insulating material laterally surrounding the first track,
said second interface being substantially parallel to a flow direction of an electric current in the first track,
the first track further comprising at least one additional interface with an insulating material, placed at a distance from the first connection which is substantially less than a width of the first track at the first interface. (Emphasis added).

Claim 1 clearly states that (1) the first track has a first interface with the first connection, and (2) the first track has a second interface with an insulating material, and (3) the first track has at

least one additional interface with an insulating material. Therefore, it is clear that the second interface of the first track is different from the first interface of the first track. The specification is very clear that the second interface of the first track is with “an insulating material laterally surrounding the first track.” (Specification, Page 4, Lines 10-15). It is clear that this portion of Claim 1 is not indefinite. The Examiner’s supposition that the second interface in Claim 1 should be with a second conducting connection is incorrect.

Further, the additional interface with an insulating material is different from the first interface and the second interface. “The device further comprises an additional interface of one of the two tracks, different from the interface of the track with the first connection and different from the lateral interface of the track with an insulating material parallel to the flow direction of the electric current in the track.” (Abstract, Lines 8-14).

The distance of the additional interface with an insulating material from the first connection that is substantially less than a width of the first track at the first interface is designated with the letter “d ” in FIGURE 3 and its location in the first track is described in the specification. Therefore the location of the distance “d ” is not indefinite.

The Applicants therefore respectfully submit that Claims 1-16 are not indefinite under 35 U.S.C. § 112 (Second paragraph) for failing to particularly point out and distinctly claim the subject matter that the Applicants regard as their invention. The Applicants respectfully request that Claims 1-16 be passed to issue.

The Applicants have added new Claims 17-20 directed to an embodiment of the invention shown in FIGURE 2 and described on Pages 10-11 of the Specification. The Applicants respectfully submit that Claims 17-20 are also in condition for allowance. The Applicants also respectfully request that Claims 17-20 be passed to issue.

The Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. The Applicants reserve the right to submit further arguments in support of their above stated position as well as the right to introduce relevant secondary considerations including long-felt but unresolved needs in the industry, failed attempts by others to invent the invention, and the like, should that become necessary.

SUMMARY

For the reasons given above, the Applicants respectfully request reconsideration and allowance of pending claims and that this Application be passed to issue. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this Application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number indicated below or at *wmunck@davismunck.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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